

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

CASE NO.: 1:01-CR-0039-01-RAMBO

UNITED STATES OF AMERICA,

Plaintiff,
vs.

HARRY SABOWITZ,

Defendant.

/

**EMERGENCY MOTION FOR A (30) DAY EXTENSION
OF DEFENDANT'S SURRENDER DATE OF JANUARY 28, 2008**

COMES NOW the Defendant, HARRY SABOWITZ, by and through his undersigned attorney, and moves this Honorable Court for an Order granting a (30) day extension of Defendant's Surrender date of January 28, 2008, and as grounds for this motion hereby submits the following:

1. That, the Defendant was sentenced on this matter on December 27, 2007.
2. That, the Court specifically recommended and directed the Bureau of Prisons that the Defendant serve his sentence at the Federal Medical Center in Devens, Massachusetts.
3. That, the Defendant is scheduled to voluntarily surrender to the institution designated by the Bureau of Prisons on January 28, 2008.

4. That, undersigned counsel's office received confirmation from the Bureau of Prison's that they did not receive Defendant's paperwork until Wednesday, January 23, 2008.
5. That, it normally takes the Bureau of Prisons approximately (30) days to process and finalize designation paperwork.
6. That, due to the delay in the Bureau of Prison's receiving Defendant's paperwork, the Bureau of Prisons will not be able to finalize the Defendant's designation by the 28th of January.
7. That, therefore, undersigned counsel is respectfully requesting a (30) day extension of the January 28, 2008 surrender date, in order to allow the Bureau of Prisons sufficient time to process Defendant's paperwork and designate him to the Federal Medical Center in Devens, Massachusetts.
8. That, undersigned counsel's office attempted to contact Assistant United States Attorney Christy Fawcett, regarding her position on this motion, but was not able to reach her at the time of filing this motion.

WHEREFORE the Defendant, HARRY SABOWITZ, respectfully requests that this Honorable Court grant a thirty (30) day extension from the date of the January 28, 2008 surrender date.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished using CM/ECF this 24th day of January, 2008 to Assistant United States

Attorney, Christy Fawcett, United States Courthouse, 228 Walnut Street, 2nd Floor,
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By: /s/ Jeffrey M. Voluck
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